

The Information Commissioner's response to the Payment Systems Regulator's consultation on general directions for the implementation of Confirmation of Payee

The Information Commissioner has responsibility for promoting and enforcing the EU General Data Protection Regulation ('GDPR'), the Data Protection Act 2018 ('DPA'), the Freedom of Information Act 2000 ('FOIA'), the Environmental Information Regulations 2004 ('EIR') and the Privacy and Electronic Communications Regulations 2003 ('PECR'). She is independent from government and upholds information rights in the public interest, promoting openness by public bodies and data privacy for individuals. The Commissioner does this by providing guidance to individuals and organisations, solving problems where she can, and taking appropriate action where the law is broken.

The Commissioner welcomes the opportunity to respond to the Payment Systems Regulator's consultation on general directions for the implementation of Confirmation of Payee.

We have reviewed the consultation paper and identified that the current focus of many of the questions does not specifically require data protection input at this point. However, there are aspects of Confirmation of Payee that may have implications for the privacy of individuals, depending on the nature of any Confirmation of Payee system and how individuals' personal data is used within that system.

The ICO would therefore welcome the opportunity to engage with the Payment Systems Regulator, and relevant stakeholders involved in the Confirmation of Payee process, to discuss data protection and privacy implications for the proposed system.